

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

THE UNITED STATES OF AMERICA

-vs-

OTIS WILLIS a/k/a O

**APRIL 2015 GRAND JURY
(Impaneled April 13, 2015)**

**13-CR-6013 FPG
THIRD
SUPERSEDING
INDICTMENT**

Violations:
Title 18, United States Code,
Sections 1591(a)(1), 1594(c) and 2
(3 Counts)

**COUNT 1
(Conspiracy to Commit Sex Trafficking)**

The Grand Jury Charges That:

Between in or about January 2012 and in or about August 2012, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, OTIS WILLIS a/k/a O, did knowingly, willfully and unlawfully combine, conspire and agree with Tiffany St. Denis and others to recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, persons under the age of 18 years, knowing and in reckless disregard of the fact that such persons had not attained the age of 18 years and that such persons would be caused to engage in a

commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 2
(Sex Trafficking of a Minor)

The Grand Jury Further Charges That:

In or about March 2012, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, OTIS WILLIS a/k/a O, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, Victim 1, a person known to the Grand Jury, a person under the age of 18 years, knowing and in reckless disregard of the fact that Victim 1 had not attained the age of 18 years and that Victim 1 would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2) and 2.

COUNT 3
(Sex Trafficking of a Minor)

The Grand Jury Further Charges That:

Between in or about June 2012 and in or about August 2012, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendant, OTIS WILLIS a/k/a O, did knowingly recruit, entice, harbor, transport, provide,

obtain and maintain by any means, in and affecting interstate commerce, Victim 2, a person known to the Grand Jury, a person under the age of 18 years, knowing and in reckless disregard of the fact that Victim 2 had not attained the age of 18 years and that Victim 2 would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2) and 2.

DATED: Rochester, New York, June 16, 2015.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

s/FOREPERSON